

**COOLEY LLP**  
MICHAEL A. ATTANASIO (151529)  
(mattanasio@cooley.com)  
BENEDICT Y. HUR (224018)  
(bhur@cooley.com)  
SIMONA AGNOLUCCI (246943)  
(sagnolucci@cooley.com)  
EDUARDO E. SANTACANA (281668)  
(esantacana@cooley.com)  
ARGEMIRA FLÓREZ (331153)  
(aflorez@cooley.com)  
NAIARA TOKER (346145)  
(ntoker@cooley.com)  
HARRIS MATEEN (335593)  
(hmateen@cooley.com)  
THILINI CHANDRASEKERA (333672)  
(tchandrasekera@cooley.com)  
ISABELLA MCKINLEY CORBO (346226)  
(icorbo@cooley.com)  
CHELSEA HU (357212)  
(chu@cooley.com)  
3 Embarcadero Center, 20th Floor  
San Francisco, CA 94111-4004  
Telephone: (415) 693-2000  
Facsimile: (415) 693-2222

Attorneys for Defendant  
GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

## Plaintiffs,

V.

GOOGLE LLC.

**Defendant.**

Case No. 3:20-CV-04688-RS

**GOOGLE'S RULE 6(B) MOTION FOR LEAVE  
TO LATE FILE OPPOSITION TO  
PLAINTIFFS' MOTION TO QUASH (ECF  
611)**

Date: August 20, 2025  
Time: 8:00 a.m.  
Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 Pursuant to Federal Rule of Civil Procedure 6(b), Google LLC respectfully asks the Court  
 2 for leave to file its opposition to Plaintiffs' Motion to Quash (ECF No. 611) late. The Court set the  
 3 filing deadline for 5:00 p.m. today, August 19, 2025. Google has good cause for its request:  
 4 Plaintiffs produced court-ordered documents essential to the opposition just 90 minutes before the  
 5 deadline.

6 Google's counsel was prepared to timely file the opposition brief, declarations, and exhibits  
 7 early this afternoon. However, Plaintiffs did not produce Susan Harvey's court-ordered medical  
 8 records until 3:27 pm today. Receiving these new documents so close to the deadline forced  
 9 Google's counsel to substantially revise the entire filing. Counsel immediately began reviewing the  
 10 records and rewriting the brief and declarations to address the new information. Despite working  
 11 as quickly as possible, Google could not complete this work before the 5:00 p.m. deadline.

12 The Court may extend a deadline after it has expired for good cause and excusable neglect.  
 13 Fed. R. Civ. P. 6(b)(1)(B). Good cause exists here. The delay is short and will have no impact on  
 14 the case schedule. The reason for the delay was Plaintiffs' last-minute production of documents, an  
 15 event outside Google's control. Granting this motion allows the Court to consider a complete record  
 16 that includes the very documents it ordered Plaintiffs to produce.

17 Google apologizes for any inconvenience to the Court. We respectfully ask the Court to  
 18 grant this motion and accept our Opposition to Plaintiffs' Motion to Quash as timely filed.

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 21 /s/ Simona Agnolucci  
 22 SIMONA AGNOLUCCI  
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